

## **Additional Clarifications for the Document ECE/TRANS/WP.29/GRB/2012/5**

This document was prepared by the expert from the Russian Federation in response to document GRB-56-08 tabled by IMMA (ECE/TRANS/WP.29/GRB/54, para. 3).

The expert from IMMA expressed a reservation on the proposal for Supplement 1 to the 04 series of amendments to Regulation No. 41 (ECE/TRANS/WP.29/GRB/2012/5) and raised several concerns in regards to the content of the proposal.

The experts from the Russian Federation provide for the comments on the concerns raised by IMMA as follows:

(1) The Technical Service of the Russian Federation several times met difficulties with interpretation of information contained in the Communications on vehicle type approvals pursuant to different noise UN Regulations including the UN Regulation No. 41. The latter is considered as an example for improvement through clear application of correct terminology and order of provisions. If the proposed amendments had agreed by GRB, then similar corrections could have been introduced for other noise UN Regulations, taking into account the activity related to “cleaning up” the UN Regulations for the purpose of IWVTA, which is being developed now.

(2) The term “noise reduction system” is more correct that the currently applied term “exhaust or silencing system”. In the text of the Regulation the term “silencing” applies to intake system, or exhaust system, or to both of them. This leads to confusion. Paragraph 2.3. of the Regulation provides for clear definition of a “noise reduction system”, therefore its meaning cannot be unreasonably widened.

(3) A catalyst has a considerable influence on the noise generated an the exhaust system contributing either to reduction or increase of noise level. Therefore a catalyst shall be considered as a part of vehicle exhaust system.

---